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January 19, 2016

VIA EMAIL & CERTIFIED MAIL

Mr. Kenneth Talton, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

RECEIVED
16 JAN 21 PM 2:20
SUPERFUND DIV.
DIRECTOR'S OFF.

Re: Hornbeck Offshore Services, Inc.
SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;
CERCLIs #: LAD008434185; Information Request Pursuant to
CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

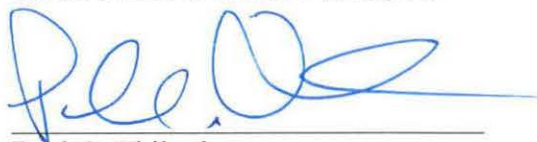
Dear Mr. Talton:

This letter provides the response of Hornbeck Offshore Services, Inc. ("Hornbeck") to EPA's CERCLA 104(e) Information Request, dated November 17, 2015. The responses are attached and made a part hereof.

Hornbeck has made a good faith effort to fully and completely respond, even if it had general or specific objections to the request. I trust that the information provided is sufficient for your needs at this time. If you have any questions, concerns, or need additional information, please contact me.

Sincerely,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC



Paul C. Thibodeaux

**HORNBECK OFFSHORE SERVICES, INC.'S RESPONSE
TO CERCLA 104(E) INFORMATION REQUEST REGARDING
SBA SHIPYARD SUPERFUND SITE, JENNINGS, LOUISIANA**

INTRODUCTION AND DEFINITIONS

The United States Environmental Protection Agency ("EPA") directed a Request for Information pursuant to Section 104(e) of CERCLA (the "Request") dated November 17, 2015, to Hornbeck Offshore Services, Inc. related to EPA's investigation of the alleged releases and/or threatened releases of hazardous substances, pollutants, or contaminants at the SBA Shipyard proposed Superfund Site. EPA agreed to an extension to January 19, 2016, to respond to this Request.

The term "Site" shall mean the SBA Shipyard proposed Superfund Site located at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana. The facility was allegedly used to construct, repair and clean out barges and other marine vessels during the mid-1960s to the early 1990s.

The term "Respondent" shall mean Hornbeck Offshore Services, Inc. and its affiliates.

RESERVATION OF RIGHTS, GENERAL OBJECTIONS, AND COMMENTS

Respondent specifically reserves all rights related to this Request and the alleged contamination of the Site. Nothing in these responses should be considered as a waiver of any of Respondent's rights; an admission of liability by Respondent for any matter addressed in the Request; and/or a waiver of any applicable defenses, privileges, or work product protections. Further, nothing in these responses should be considered as an admission of Responsible Party status.

In responding to this information request, Respondent has made a good faith effort to fully and completely respond to the Request. Respondent is responding to EPA's Request to the best of its knowledge based on information currently available. Respondent interviewed employees and others who may have relevant information, and searched for documents that may be responsive to EPA's Request. Respondent's investigation into this matter is continuing and Respondent reserves the right to supplement this response if additional information becomes available.

EPA's Request states that EPA is seeking information related to the alleged contamination of the SBA Shipyard proposed Superfund Site located at 9040 Castex Landing Road in Jennings, Louisiana. Respondent notes that it has utilized a different LEEVAC Shipyards facility located at 111 Bunge Street (Hwy 90 East), P.O. Box 1190, Jennings, LA 70546, for the construction of new vessels and/or barges. LEEVAC Shipyards' Bunge Street facility is located miles from, and is geographically distinct from, the Site at issue.

Respondent generally objects to this Request to the extent that it seeks information that is irrelevant to the Site at issue. Respondent generally objects to the extent the Request is unduly burdensome, overbroad, vague, and unreasonable in light of the specific information sought regarding the Site. Respondent generally objects to the extent the request seeks privileged and/or work-product protected information.

In response to this Request, Respondent has produced specific company confidential information, which is delineated in the responses below, documents provided, and/or attached Appendix. Respondent specifically requests that this information be kept and remain permanently confidential by EPA, as disclosure of such company confidential information would result in harm to Respondent's business. 42 U.S.C. § 9604(e); 18 U.S.C. § 1905.

RESPONSE

EPA's questions are stated in bold below. Respondent's responses are in non-bold type. Relevant documents are provided herewith (via electronic drive) and listed in the attached Appendix.

Section 1

1. Do you have or have you ever had a corporate relationship with LEEVAC Marine, LLC?

Yes.

a. If so, explain your corporate relationship with LEEVAC Marine, LLC and provide all corporate documentation with respect to your corporate relationship with LEEVAC Marine, LLC in question 1 above.

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Respondent (or any of its predecessor entities) was not formed until 1997. Prior to Respondent's formation, LEEVAC Marine, LLC's predecessor entity, LEEVAC Marine, Inc., was a going concern unrelated to Respondent. After Respondent's formation in 1997, it merged with LEEVAC Marine, LLC's predecessor entity, LEEVAC Marine, Inc. In December 2001, LEEVAC Marine, Inc. became LEEVAC Marine, LLC, which is a predecessor entity to Hornbeck Offshore Transportation, LLC, a wholly-owned subsidiary of Respondent. A brief summary of the relevant corporate history follows:

- On June 2, 1997, Respondent's corporate predecessor, HV Marine Services, Inc., was incorporated.
- On June 5, 1997, LEEVAC Marine, Inc. (a pre-existing entity) became a wholly-owned subsidiary of Respondent's corporate predecessor, HV Marine Services, Inc. Relevant excerpts of the applicable merger agreement are provided herewith.
- In December 1999, HV Marine Services, Inc. changed its name to HORNBECK-LEEVEAC Marine Services, Inc.

- In December 2001, LEEVAC Marine, Inc. changed its name to LEEVAC Marine, LLC.
- On December 17, 2001, Hornbeck Offshore Transportation, LLC was formed.
- On May 29, 2002, LEEVAC Marine, LLC changed its name to Hornbeck Offshore Transportation, LLC.
- Also on May 29, 2002, HORNBECK-LEE VAC Marine Services, Inc. changed its name to Hornbeck Offshore Services, Inc.

Relevant documents are identified in the attached Appendix.

2. Were you involved in LEEVAC Marine, LLC day-to-day operations between 1965 and 1993?

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

No. Respondent (or any of its corporate predecessors) was not formed until 1997. Please see the response to Question 1 above.

a. If so, describe your role in such day-to-day operations.

None.

3. Have you in any way been involved with the Site?

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Yes. Respondent's involvement with the Site is limited to its participation as a member of SSIC Remediation, LLC ("SSIC") regarding allegations that four LEEVAC Marine, Inc. barges were cleaned at the Site in the 1980's, approximately 10 years prior to Respondent's corporate formation.

a. If so, please describe your involvement with the Site.

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations.

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, LEEVAC Marine, Inc. was involved in negotiations regarding an environmental remediation of the Site at issue. That matter involved alleged environmental contamination resulting from the Site's cleaning of barges and negotiations regarding potential voluntary remediation of the Site. These negotiations included companies that were alleged to be former barge cleaning customers of the Site. LEEVAC Marine, Inc. entered into a joint participation agreement with companies involved in the potential voluntary remediation, in part to facilitate negotiations and to allocate the percentage of remediation participation amongst the parties based on, *inter alia*, the parties' alleged use of barge cleaning services at the Site. LEEVAC Marine, Inc.'s percentage was estimated by the parties to be under 3% based on the allegations that four LEEVAC Marine, Inc. barges were cleaned at the Site between 1985 and 1988.

In 2001, SSIC was formed by some of the aforementioned alleged former customers of the Site to facilitate negotiations with the EPA and the former Site owner/operator, SBA Shipyards, Inc., and its principals, including Mr. Louis Smailhall, and to perform voluntary remediation activities at the Site. Respondent was a member of SSIC regarding the aforementioned allegations that four LEEVAC Marine, Inc. barges were cleaned at the Site between 1985 and 1988.

SSIC participated in and funded a Resource Conservation and Recovery Act (RCRA) Interim Measures/Removal Action at the Site from 2001 to 2005 under EPA direction and approval. Respondent's percentage of remediation participation amongst the SSIC members was less than 3%. EPA deemed that RCRA action complete and satisfied in February 2006. SSIC dissolved at the end of 2009.

On November 30, 2015, comments on the proposed National Priorities Listing of the SBA Shipyards Jennings, Louisiana site were submitted by and on behalf of former members of, or successors in interest to former members of, SSIC, including Respondent's affiliate, Hornbeck Offshore Transportation, LLC. The comments provide additional detail regarding SSIC and its involvement with the RCRA Interim Measures/Removal Action.

4. Provide copies of documents related to any involvement identified in question 3(a) above.

Relevant documents are identified in the attached Appendix.

5. If you have had any involvement with the Site and/or on behalf of LEEVAC Marine, LLC, please provide responses to the questions below.

Question 5 does not require a response. Please see the below responses.

Section 2

6. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards

Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.

Respondent objects to the extent the request seeks information irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

With respect to the Site at issue, Respondent's dealings or transactions, including dealings or transactions with SBA Shipyards, Inc., Louis Smailhall, and Suzanne Smailhall, are set forth in its responses to Questions 3 and 4. After a reasonable investigation, Respondent has not located additional information regarding any dealings or transactions that LEEVAC Marine, Inc. may have had regarding the Site prior to becoming a subsidiary of Respondent in 1997.

Regarding Respondent's dealings or transactions with LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and/or LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC ("LEEVAC Shipyards"), after a reasonable investigation, Respondent is not aware of any dealings or transactions related to the Site at issue.

In the interest of full disclosure, Respondent notes that it has utilized a different LEEVAC Shipyards facility located at 111 Bunge Street (Hwy 90 East), P.O. Box 1190, Jennings, LA 70546, for the construction of new vessels and/or barges from approximately November 1997 through August 2010. Presently, two new vessels are under construction for Respondent at this facility. See description of facility at <http://www.LEEVAC.com/Jennings>. LEEVAC Shipyards' Bunge Street facility is located miles from, and is geographically distinct from, the Site at issue.

Respondent has also had vessel repair/dry dock work done in different locations by LEEVAC Shipyards Houma, LLC, and LEEVAC Shipyards Lake Charles, LLC and has had transactions with LEEVAC Design Services, LLC, and LEEVAC Shipbuilding and Repair Calcasieu, LLC, none of which is related to the Site at issue.

Finally, Mr. Christian G. Vaccari, Chairman and CEO of LEEVAC Shipyards Jennings, LLC, served as Respondent's Chairman of the Board and Chief Executive Officer from Respondent's inception in 1997 until February 2002, and served as one of Respondent's directors until May 2004. Mr. Vaccari is also associated with Cari Investment Company n/k/a Cari Investment Company, LLC, which was a party to the June 5, 1997 merger between HV Marine Services, Inc., and LEEVAC Marine, Inc.

- a. Specifically, provide date(s) that your barge(s) were sent and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements.**

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Please see Respondent's response to Questions 3, 4, and 6.

Since Respondent's corporate formation in 1997, Respondent is not aware of any of its barges that were sent and/or removed from the Site.

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988 that allegedly had previous cargoes of black oil, crude oil, No. 6 oil, gasoline, and/or diesel. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations and has not located information responsive to this request.

7. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 6 above.

Please see the relevant documents listed in the attached Appendix.

8. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Please see Respondent's responses to Questions 3, 4, 6, and 7.

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988 that allegedly had previous cargoes of black oil, crude oil, No. 6 oil, gasoline, and/or diesel. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations and has not located information responsive to this request.

9. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA) at the Site. Please provide any and all documents in your possession related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA.

Respondent objects to this request to the extent it seeks information that is privileged and/or work product protected. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Please see Respondent's response to Questions 3, 4, 6, and 7.

The parties involved in the IM/RA are identified in the documents listed in the attached

Appendix. Please note that in the Document entitled “SSIC Remediation LLC List of Members,” Respondent’s affiliate was improperly named, and should have been identified as Hornbeck Offshore Transportation, LLC.

Please see the relevant documents listed in the attached Appendix.

10. Please provide the names, title, and contact information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

Respondent objects to the vagueness of the request and to the extent the request seeks information that is irrelevant to the Site. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Prior to Respondent’s (or its corporate predecessors’) corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations and is not aware of employees or others who possess specific knowledge or information regarding LEEVAC Marine, Inc.’s alleged barge cleanings at the Site.

To the extent Respondent or its employees possess knowledge or information about the alleged contamination of the Site, that knowledge or information was learned through Respondent’s participation as a member of SSIC and its most recent discussions with counsel for former members of SSIC regarding the 2015 Proposed National Priorities Listing of the Site. The following is a list of Respondent’s employees and former employees that may possess knowledge and/or information regarding the Site as it relates to Respondent’s business operations:

- Kathleen Harrison
Senior Counsel – Compliance
Hornbeck Offshore Services, Inc.
103 Northpark Blvd., Suite 300
Covington, LA 70433
Telephone: (985) 727-3707
- Paul Ordogne – former Corporate Secretary of Respondent (POC for SSIC Remediation, LLC); formerly with Cari Investment Company. Mr. Ordogne is retired. Mr. Ordogne can be contacted through:
Paul C. Thibodeaux
Baker Donelson, Bearman, Caldwell &
Berkowitz, PC
201 St. Charles Avenue
Suite 3600
New Orleans, LA 70170
Telephone: (504) 566-8634

The following is a list of others who Respondent understands were involved in the SSIC-related remediation and/or may have relevant information regarding the Site:

- Michael A. Chernekoff
Counsel for SSIC
Jones Walker LLP
1001 Fannin St, Ste 2450
Houston, TX 77002
Telephone: (713) 437-1827
E-mail: mchernekoff@joneswalker.com
- Michael E. Pisani
Michael Pisani & Associates, Inc.
1100 Poydras Street, Suite 1430
New Orleans, Louisiana 70163-1430
Telephone: (504) 582-2469
Facsimile: (504) 582-2470
E-mail: mpisani@mpisani.com
- Christian Vaccari – Mr. Vaccari is the Chairman and CEO of LEEVAC Shipyards Jennings, LLC; and former CEO of HV Marine Services, Inc., and Hornbeck-LEE VAC Marine Services, Inc. Mr. Vaccari's contact information may be as follows:
217 North Columbia Street
Covington, Louisiana 70433
- Mike Bellone
Bellone Culpepper & Associates, LLC
203 Willow Circle
Mandeville, LA 70471

The following is a list of others who Respondent understands were employees of LEEVAC Marine, Inc. or Leevac Shipyards, Inc. prior to 1997 that may have relevant information:

- Frederick Stokes – Mr. Stokes may have been the President of LEEVAC Shipyards, Inc. sometime prior to 1997. Respondent is not aware of Mr. Stokes' contact information.
- Roger Beaudeon – Mr. Beaudeon may have been the President of LEEVAC Marine, Inc. sometime prior to 1997. Respondent is not aware of Mr. Beaudeon's contact information.
- Dennis Taylor – Mr. Taylor may have been an operations manager for LEEVAC Marine, Inc. sometime prior to 1997. Respondent is not aware of Mr. Taylor's contact information.

- 11. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:**
- a. Each individual's job title and duties (including the dates performing those duties),**
 - b. The supervisors for such duties,**
 - c. The current position or the date of the individual's resignation,**
 - d. The nature of the information possessed by such individuals concerning the Respondent's waste management, and**
 - e. The contact information of the individual.**

Respondent objects to the vagueness of the request and to the extent the request seeks information that is irrelevant to the alleged contamination of the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Please see Respondent's response to Questions 3, 4, 6, 7, and 10.

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations and is not aware of employees or others who had responsibility for environmental matters related to the Site at issue.

Since Respondent was not formed until 1997, to the extent Respondent or its employees possess knowledge or information about the alleged contamination of the Site, that knowledge or information was learned through Respondent's participation as a member of SSIC and its most recent discussions with counsel for former members of SSIC regarding the 2015 Proposed National Priorities Listing of the Site.

Respondent has employees and others that are responsible for environmental matters that are irrelevant to the Site at issue, including vessel personnel; operations personnel; and health, safety, and environmental managers and directors.

- 12. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).**

Respondent objects to the extent the request seeks information that is irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Respondent is not aware of any permit issued to it under RCRA.

13. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Respondent objects to the extent the request seeks information that is irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Respondent is not aware of any RCRA identification numbers issued to it.

14. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s).

Respondent objects to the extent the request seeks information that is irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Respondent does not have and has not had a permit under the hazardous waste laws of the State of Louisiana.

15. (a) Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

Respondent objects to the extent the request seeks information that is irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

Respondent has the following EPA Identification Numbers supplied by the State of Louisiana Department of Environmental Quality ("LDEQ"):

- Respondent's affiliate Hornbeck Offshore Services, LLC (a wholly-owned subsidiary of Hornbeck Offshore Services, Inc.) presently has EPA Identification Number ("EPA ID No.") LAR000036012 supplied by LDEQ as a transporter of exploration and production waste in accordance with 40 CFR 263.11. The LDEQ Agency Interest Number is 80545.
- Respondent's affiliate Hornbeck Offshore Services (Morgan City, LA address) held EPA ID No. LAR000032953 in 1998-1999.
- Respondent's affiliate Hornbeck Offshore Transportation, LLC, f/k/a LEEVAC Marine, LLC, f/k/a LEEVAC Marine Inc. once maintained EPA ID No. LAR000036020 supplied by LDEQ as a transporter of exploration and production waste in accordance with 40

C.F.R. § 263.11. As of 2014, this EPA ID number had been transferred to Genesis Marine LLC.

- In addition, EPA provides each of Respondent's vessels with a tracking number in connection with each vessel's Notice of Intent filed in connection with the NPDES Vessel General Permit.

Please see the relevant documents listed in the attached Appendix.

15. (b) Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

Respondent objects to the extent the request is vague and seeks information that is irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

From approximately 1997 through the present, Respondent has filed reports of spills in the water and/or other hazardous substance or hazardous waste information with the United States Coast Guard's ("USCG") National Response Center, regional USCG offices, regional EPA offices, and state and local agencies as indicated in the table below. Typical reports concern oil, oily water, and offshore marine drilling fluids.

Entity	Year
United States Coast Guard – National Response Center	Approximately 1997 to present
United States Coast Guard Offices	
Boston, MA	2012
Long Island Sound (New Haven, CT)	2003 and 2014
New York, NY	2006
Jacksonville, FL	2009, 2010, 2014 and 2015
Mobile, AL	2009 and 2014
New Orleans, LA	2009, 2010, and 2013
Morgan City, LA	2001, 2005, 2006, 2007, 2008, 2009, 2010, 2012, 2013, 2014, and 2015
Houston/Galveston, TX	2007, 2011, 2012, and 2015
San Diego, CA	2014 and 2015
Los Angeles – Long Beach, CA	2013
Seattle, WA	2006, 2008, 2009, 2012, and 2014
San Juan, PR	2006, 2008, and 2009
United States EPA	
Region 1	2012

Region 2	2012
Region 4	2010
Region 6	2009, 2010, 2011, 2012, 2013
Region 9	2013
Region 10	2009, 2010, and 2012
United States Navy	
United States Navy Base in Groton, CT	2014
State Agencies	
Louisiana Department of Environmental Quality	1998-present (in connection with the EPA ID Nos.)
Louisiana State Police	2008, 2009, 2010, 2011, 2012, 2013, 2014, and 2015
Texas General Land Office	2007, 2011, 2012, and 2015
Alabama Department of Environmental Management	2009 and 2014
Washington State Maritime Coop	2009 and 2012
Washington Emergency Management Division	2012
Washington Department of Ecology	2008, 2009, and 2014
California Office of Spill Prevention & Response	2015
California Office of Environmental Services	2014
California Department of Fish/Game Office of Spill Prevention/Response (OSPR)	2013
Georgia Department of Natural Resources	2010, 2014, and 2015
Connecticut Department of Energy & Environmental Protection	2014
Massachusetts Department of Environmental Protection	2012
Local Agencies	
Port Fourchon Harbor Police, LA	2008, 2010, 2012, 2013, 2014, and 2015
Plaquemines Parish Office	2013

16. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

After a reasonable investigation, Respondent has not located any documents created or kept by the Respondent that identify the nature, quantity, or source of any materials taken to the Site. Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges

cleaned at the Site between May 1985 and July 1988 that allegedly had previous cargoes of black oil, crude oil, No. 6 oil, gasoline, and/or diesel. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations and has not located information responsive to this request. However, the document setting forth SBA Shipyards' allegations ("SBA SHIPYARDS, INC.[.] CUSTOMER INFORMATION RELATING TO HISTORICAL BARGE CLEANING ACTIVITIES (Revised August 15, 1996)") has been provided.

Please see also Respondent's responses to Questions 3, 4, 6, 7, and 10.

17. If barges were placed or disposed at the Site, provide the following information:

- a. Where they were placed or disposed, and**
- b. Their condition when placed or disposed.**

Subject to and without waiving the above general objections, upon information and belief, Respondent responds as follows:

Respondent has not placed or disposed of any barges at the Site.

Prior to Respondent's (or its corporate predecessors') corporate formation in 1997, SBA Shipyards, Inc. alleged that LEEVAC Marine, Inc. and/or Domar Marine had four barges cleaned at the Site between May 1985 and July 1988. After a reasonable investigation of these allegations, Respondent is not able to confirm nor deny the allegations. To the extent any LEEVAC Marine, Inc. barges were cleaned at the Site between 1985 and 1988, after a reasonable investigation, Respondent has not located additional information regarding any barges placed or disposed of at the Site by LEEVAC Marine, Inc.

18. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

Respondent objects to the request to the extent it is vague and/or seeks information that is irrelevant to the alleged contamination of the Site. Subject to and without waiving the above general and specific objections, upon information and belief, Respondent responds as follows:

After a reasonable investigation, Respondent has no direct knowledge regarding individuals or entities that may have taken or sent materials to the Site.

Respondent is aware of the identities of former members of SSIC Remediation, LLC, but has no direct knowledge regarding whether or not they have taken or sent materials to the Site.

Further, Respondent is aware of the document entitled "SBA SHIPYARDS, INC.[.] CUSTOMER INFORMATION RELATING TO HISTORICAL BARGE CLEANING ACTIVITIES (Revised August 15, 1996)" and the allegations set forth therein but has no direct knowledge regarding whether or not the information contained in that document is accurate.

GENERAL INFORMATION CONCERNING RESPONDENT

1. Provide the full legal name and mailing address of the Respondent.

Hornbeck Offshore Services, Inc.
103 Northpark Boulevard, Suite 300
Covington, LA 70433

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

Respondent relied on and/or consulted the following persons in preparation of its answer to EPA's Request:

Paul C. Thibodeaux Outside counsel for Respondent Paul Ordogne Hornbeck Offshore former Corporate Secretary (retired)	Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 201 St. Charles Avenue Suite 3600 New Orleans, LA 70170 Telephone: (504) 566-8634
Kathleen Harrison Senior Counsel – Compliance Timothy Sullivan Manager of Regulatory Affairs and Environmental Compliance Olivia Duplessis Government Property Administrator Beth LaBrosse Senior Tax Advisor – Personal Financial Services Boyd Kitchen Director of Financial Reporting George McCoy Operations Manager	Hornbeck Offshore 103 Northpark Blvd., Suite 300 Covington, LA 70433 Telephone: (985) 727-3707

Michael A. Chernekoff Outside counsel for SSIC	Jones Walker LLP 1001 Fannin St, Ste 2450 Houston, TX 77002 Telephone: (713) 437-1827 E-mail: mchernekoff@joneswalker.com
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3. **If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.**

Paul C. Thibodeaux
Outside counsel for Respondent
Baker Donelson, Bearman, Caldwell &
Berkowitz, PC
201 St. Charles Avenue
Suite 3600
New Orleans, LA 70170
Telephone: (504) 566-8634

4. **If Respondent is a business, please give a brief description of the nature of the business.**

Hornbeck Offshore Services, Inc. is a provider of marine transportation, subsea installation and accommodation support services to exploration and production, oilfield service, offshore construction and U.S. military customers.

REQUESTS FOR DOCUMENTS

Please identify (see Definitions) and provide copies of all documents (see Definitions) consulted, examined, or referred to in the preparation of the answers to the above questions including all subparts of each question, or that contain information responsive to the question.

Respondent objects to the extent the request seeks information that is privileged, work product protected, and/or irrelevant to the Site at issue. Subject to and without waiving the above general and specific objections, Respondent responds as follows:

Please see the documents provided herewith and Respondent's responses to the questions above, which include references to the attached Appendix listing the relevant documents.

Appendix

Question 1

Bates Number	Date	Description	Confidential?
HOS000001	9/12/2006	Hornbeck Offshore Transportation LLC - Certificate of Good Standing (Delaware)	
HOS000009	8/10/2009	Hornbeck Offshore Transportation - Certificate of Good Standing - Certificate Only of Delaware	
HOS000011	5/19/2010	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000012	8/10/2009	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000020	5/31/2002	Leevac Marine, LLC - Certificate of Amendment, changing its name to "Hornbeck Offshore Transportation, LLC"	
HOS000026	3/24/2010	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000027	6/12/2013	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000028	11/2/2011	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000030	11/2/2011	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000038	5/22/2009	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000039	9/27/2005	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000047	9/12/2006	Hornbeck Offshore Transportation - Certificate of Good Standing (Delaware)	
HOS000055	9/20/2006	Secretary of State Certificate and copy of Qualification Documents, Amendment	

		and 2006 Annual Report of Hornbeck Offshore Transportation, LLC	
HOS000062	5/19/2010	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000063	5/19/2010	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Louisiana)	
HOS000064	2/29/2012	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000067	11/2/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000080	9/29/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000081	2/29/2012	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000084	8/10/2009	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware) - Long form	
HOS000134	8/10/2009	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000137	3/29/2012	Hornbeck Offshore Services, Inc. - True and correct copies of all documents filed from and including the restated certificate or a merger with restated certificate attached of "Hornbeck Offshore Services, Inc."	
HOS000150	5/19/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000151	5/30/2002	Hornbeck-Leevac Marine Services, Inc. - Certificate of Amendment, changing its name to "Hornbeck Offshore Services, Inc."	
HOS000158	6/4/2013	Hornbeck Offshore Services, Inc. - True and correct copies of all documents filed from and including the restated certificate of a merger with a restated	

		certificate attached of "Hornbeck Offshore Services, Inc."	
HOS000171	11/2/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000174	6/4/2013	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000175	11/2/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Louisiana)	
HOS000176	11/2/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Louisiana)	
HOS000185	5/19/2011	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Louisiana)	
HOS000186	9/27/2005	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000199	3/5/2004	Second Restated Certificate of Incorporation of Hornbeck Offshore Services, Inc.	
HOS000210	1/8/2014	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000211	10/6/2004	Hornbeck Offshore Services, Inc. - Certificate of Good Standing (Delaware)	
HOS000212	1/7/2009	Second Restated Certificate of Incorporation of Hornbeck Offshore Services, Inc.	
HOS000223	12/31/2001	2001 Annual Report	
HOS000335	12/31/2003	2003 Annual Report	
HOS000435	12/31/2004	2004 Annual Report	
HOS000554	6/5/1997	1997 Merger Agreement - Excerpts	Company Confidential / Contains Personal Privacy Information

Question 3 & 4

Tab/Doc ID	Date	Description	Confidential?
HOS000223	12/31/2001	2001 Annual Report	
HOS000335	12/31/2003	2003 Annual Report	
HOS000435	12/31/2004	2004 Annual Report	
HOS000541	00/00/2001	LA SOS Info on SSIC Remediation, LLC	
HOS000543	5/5/1997	Minutes of Meeting of the Board of Directors Leevac Marine, Inc.	Company Confidential
HOS000545	12/12/2002	United States Environmental Protection Agency Ltr from Gene Keepper, CHMM RCRA Project Manager Teichal Section to Louis Smaihall, Owner/President SBA Shipyards, Inc. re Transmittal of Executed and Filed Order and Agreement for Interim Measures/Removal Action of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc.	Company Confidential
HOS000560	12/09/2002	EPA Order - EXECUTED by Smaihall, SSIC (Arlene Cenac)	Company Confidential
HOS000569	8/15/2001	Statement of Work Accelerated Cleanup Action SBA Shipyards 2001.08.15	Company Confidential
HOS000578		SSIC Remediations LLC List of Members - Alphabetical	Company Confidential
HOS000580	8/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 6 & 7

Tab/Doc ID	Date	Description	Confidential?
HOS000223	12/31/2001	Annual Report	
HOS000335	12/31/2003	2003 Annual Report	
HOS000435	12/31/2004	2004 Annual Report	
HOS000543	5/5/1997	Minutes of Meeting of the Board of Directors Leevac Marine, Inc.	Company Confidential
HOS000545	12/12/2002	United States Environmental Protection Agency Ltr from Gene Keepper, CHMM RCRA Project Manager Teichal Section to Louis Smaihall, Owner/President SBA Shipyards, Inc. re Transmittal of Executed and Filed Order and Agreement for Interim Measures/Removal Action of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc.	Company Confidential
HOS000560	12/09/2002	EPA Order - EXECUTED by Smaihall, SSIC (Arlene Cenac)	Company Confidential
HOS000569	8/15/2001	Statement of Work Accelerated Cleanup Action SBA Shipyards 2001.08.15	Company Confidential
HOS000578		SSIC Remediations LLC List of Members - Alphabetical	Company Confidential
HOS000580	8/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 8

Tab/Doc ID	Date	Description	Confidential?
HOS000223	12/31/2001	2001 Annual Report	
HOS000335	12/31/2003	2003 Annual Report	
HOS000435	12/31/2004	2004 Annual Report	
HOS000543	5/5/1997	Minutes of Meeting of the Board of Directors Leevac Marine, Inc.	Company Confidential
HOS000580	8/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 9

Tab/Doc ID	Date	Description	Confidential?
HOS000223	12/31/2001	2001 Annual Report	
HOS000335	12/31/2003	2003 Annual Report	
HOS000435	12/31/2004	2004 Annual Report	
HOS000569	8/15/2001	Statement of Work Accelerated Cleanup Action SBA Shipyards 2001.08.15	Company Confidential
HOS000578		SSIC Remediations LLC List of Members - Alphabetical	Company Confidential
HOS000580	08/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 16

Tab/Doc ID	Date	Description	Confidential?
HOS000580	08/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 17

Tab/Doc ID	Date	Description	Confidential?
HOS000580	08/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential

Question 18

Tab/Doc ID	Date	Description	Confidential?
HOS000578		SSIC Remediations LLC List of Members - Alphabetical	Company Confidential
HOS000580	08/15/1996	SBA Shipyards, Inc. Customer Information Relating to Historical Barge Cleaning Activities	Company Confidential